February 14, 2003

Docket Management
Room PL-401
400 Seventh Street SW
Washington, DC 20590

RE: Event Data Recorders, Request for Comment, October 11, 2002 [67 FR 63493], Docket No.: 13546

The Honorable Jeffrey W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Dear Dr. Runge,

The following comments are hereby transmitted on behalf of the IEEE Motor Vehicle Event Data Recorder (MVEDR) working group, heretofore known as P1616, in reference to NHTSA's request for comments, published in the Federal Register on October 11, 2002. The purpose of these comments is to describe the purpose, scope, organization, and schedule of P1616. These comments represent the summary and status of P1616 activities by the co-chairmen and the majority viewpoints of P1616 members. It does not necessarily represent the views of IEEE, which has not reviewed or approved this response.

MVEDRs collect, record, store and export data related to motor vehicle pre-defined events. P1616 was formed in early 2002 to draft an industry standard to define a protocol for MVEDR output data compatibility and export protocol of MVEDR data elements. This standard does not prescribe which specific data elements shall be recorded, or how the data are to be collected, recorded, and stored. It is applicable to event data recorders for all types of motor vehicles licensed to operate on public roadways, whether offered as original or aftermarket equipment, whether stand-alone or integrated within the vehicle.

Many light-duty motor vehicles and increasing numbers of heavy commercial vehicles are equipped with some form of MVEDR. These systems, which are designed and produced by individual motor vehicle manufacturers and component suppliers, are diverse in function, and proprietary in nature. The continuing implementation of MVEDR systems provides an opportunity to voluntarily standardize data output and retrieval protocols to facilitate analysis and promote compatibility of MVEDR data. Adoption of the standard will therefore make EDR data more accessible and useful to end-users.

P1616 consists of members from many interests including academia, government, automobile manufacturers, safety advocates, aftermarket manufacturers, and other stakeholders. The membership is open to interested parties willing to provide input to the standard drafting process. Recently, P1616 formed three technical subcommittees tasked with EDR definition, data definition, and output protocol determination.

P1616 looks forward to finalizing this standard by early 2004. The following milestones are envisioned (listed by their completion date):

February 2003 - Identify and define terms and technical design
May 2003 -Identify data and system requirements
July 2003 - Gain consensus on draft standard
November 2003 – Initiate IEEE sponsor ballot
March 2004 – Standards approval

Please feel free to contact the undersigned should you have any questions.

Sincerely,

/s/

IEEE MVEDR Working Group
Mr. James Hall, co-chairman
Hall & Associates
400 7th St. N.W.
Washington, DC
20004
(202)-312-0600
jhall@hallassoc.net

Mr. Tom Kowalick, co-chairman
305 South Glenwood Trail
Southern Pines, North Carolina
28387
(910) 692-5209
tkowalick@nc.rr.com